

From: [ANDERSON Jim M](#)
To: [Chip Humphrey/R10/USEPA/US@EPA](#); [Eric Blischke/R10/USEPA/US@EPA](#); [Kristine Koch/R10/USEPA/US@EPA](#)
Cc: [POULSEN Mike](#); [PETERSON Jenn L](#); [MCCLINCY Matt](#); [GAINER Tom](#)
Subject: Comments on RD2 SCSR Section 10
Date: 03/14/2008 02:41 PM

Eric & Chip,

Nice job, as usual, of putting together comprehensive, significant, clear & directive comments to the LWG. Here are my thoughts on Section 10 & EPA's draft comments to Section 10. The only other person from DEQ I expect to submit comments to you is Jennifer, & she should have those to you by COB Mon 3/17.

1) General Comment (bottom of page 1), EPC- Will the LWG know specifically how to calculate an EPC that will be acceptable to EPA?

2) Section 10.1.1.1 (bottom of page 2), background levels- All project parties probably understand what you mean when you're discussing "background levels" for organics like PCBs, pesticides & dioxins..., but perhaps a more accurate term is "anthropogenic background" or in my mind for this instance, "baseline level".

3) Section 10.1.1.1.1 (bottom of page 3) & Section 10.1.1.1.2 (middle of page 4), residential & industrial drinking water PRGs- I understand that EPA Region 6 only lists "residential water" PRGs, not "industrial drinking water PRGs".

4) Section 10.1.1.1.2 (middle of page 4), HH PRGs- The LWG should be clear that EPA previously directed them to look at surface water (rather than TZW) as the point of exposure for the HH drinking-water scenario, but that EPA wants the LWG to look at TZW concentrations that may pose a loading threat to the surface-water drinking-water exposure scenario. While EPA's 1st comment sentence for this section says that HH drinking-water PRGs should be applied to TZW to ensure the protection of surface water, your comment really doesn't go beyond that & describe how a loading potential will be developed & applied. I'm concerned someone could read EPA's 1st sentence & infer that EPA is directing the LWG to apply drinking water PRGs directly to TZW.

5) Section 10.1.1.1.2 (middle of page 4), pore water concentrations in the absence of TZW data- Is EPA really asking the LWG to calculate a pore water concentration based equilibrium partitioning at every sediment sample station where TZW data doesn't exist? We've talked about this issue several times at TCT mtgs, & I'm not opposed to this idea, but it would be a pretty large effort that I don't think the LWG was anticipating.

6) Section 10.1.1.1.3 (top of page 5), identifying AOPC based on subsurface sediment data- I'm not real clear what EPA is asking of the LWG here. I agree that if surface sediment are contaminated & they define an AOPC, then subsurface contamination clearly needs to be considered in the FS. I think EPA is also saying that if subsurface contamination exists in the relative absence of surface sediment contamination (granted a relatively unlikely scenario)..., especially in areas subject to erosion, bioturbation, future dredging action, or GW transport processes..., then this subsurface contamination needs to be accounted for. Are you specifically directing the LWG to define AOPCs based on subsurface sediment contamination that pose a potential for exposure? I would agree with that direction.

7) Section 10.1.2.1 (middle of page 6), breast milk- Has EPA decided to drop the breast milk exposure scenario from the HH BRA?

Jim Anderson
Manager, DEQ Portland Harbor Section
ph: 503.229.6825

fax: 503.229.6899
cell: 971.563.1434